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August 8, 2011

RON BASS, TREASURER
ORANGE COUNTY REPUBLICAN EXECUTIVE
COMMITTEE
1320 N SEMORAN BLVD STE 207
ORLANDO, FL 32807

Response Due Date 09/12/2011

IDENTIFICATION NUMBER: C00443119

REFERENCE: MID-YEAR REPORT (01/01/2011 - 06/30/2011)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 3 item(s):

- 1. On Schedule H1 of your report, you have checked an incorrect fixed percentage for your allocated federal and non-federal administrative, generic voter drive and exempt activity costs. The fixed percentage for these costs is based on whether a Presidential and/or a Senate candidate appear on the State's ballot. Please amend your report to include a corrected Schedule H1 and note that a change in this ratio may make it necessary to repay your non-federal account for any overpayments that may have been made. While the Commission may take further legal action concerning any impermissible overpayments by the non-federal account, your prompt action will be taken into consideration. (11 CFR §106.7(d)(2) and (3))
- 2. Schedule H4 of your report discloses disbursements for the Administrative category which use a ratio that is inconsistent with the ratio disclosed on Schedule H1. The fixed ratio for the allocation of administrative, generic voter drive and exempt activity expenses by State, district and local party committees should be the same for the full two-year election cycle, unless a Special election is scheduled during an odd numbered year. Please amend your report to clarify this apparent discrepancy.

Please note that if your non-federal account has overpaid your federal account because of this miscalculation, it will be necessary to immediately transfer these funds back to the non-federal account. While the Commission may take

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further legal action concerning any impermissible overpayments by the non-federal account, your prompt action will be taken into consideration. (11 CFR §§106.7(d))

3. On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the purpose for the payment made to "JOHNATHAN SWIFT." Note that the activity or event identifier is not considered an adequate description of purpose. Please amend your report to include this missing information. (11 CFR §§104.10(b)(4) and 104.17(b)(3))

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1147.

Sincerely,

Maureen Benitz

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Sr. Campaign Finance & Reviewing Analyst Reports Analysis Division